



TEXAS STATE CONFERENCE OF NAACP  
BRANCHES; and the MEXICAN AMERICAN  
LEGISLATIVE CAUCUS OF THE TEXAS  
HOUSE OF REPRESENTATIVES,

*Plaintiffs,*

V.

JOHN STEEN, in his official capacity as Secretary of State of Texas; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,

*Defendants.*

CIVIL ACTION NO.  
2:13-CV-291 (NGR)  
[Consolidated case]

BELINDA ORTIZ, LENARD TAYLOR,  
EULALIO MENDEZ JR., LIONEL ESTRADA;  
ESTELA GARCIA ESPINOSA, LYDIA LARA,  
MARGARITO MARTINEZ LARA,  
MAXIMINA MARTINEZ LARA, AND  
*LA UNION DEL PUEBLO ENTERO, INC.*

*Plaintiffs,*

V.

STATE OF TEXAS; JOHN STEEN, in his Official capacity as Texas Secretary of State; And STEVE McCRAW, in his official capacity As Director of the Texas Department of Public Safety,

*Defendants.*

CIVIL ACTION NO.  
2:13-CV-348 (NGR)  
[Consolidated case]

**ORTIZ PLAINTIFFS' DESIGNATION OF EXPERT WITNESS**

Plaintiffs BELINDA ORTIZ, LENARD TAYLOR, EULALIO MENDEZ JR., LIONEL ESTRADA; ESTELA GARCIA ESPINOSA, LYDIA LARA, MARGARITO MARTINEZ LARA, MAXIMINA MARTINEZ LARA, AND *LA UNION DEL PUEBLO ENTERO, INC.*

(LUPE) hereby designate the following retained witness Plaintiffs may use at trial to present evidence under Federal Rule of Evidence 702, 703, or 705:

Kevin G. Jewell  
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His report has been designated confidential pursuant to the Consent Protective Order (Dkt. No. 105) entered in this cause, and filed separately under seal pursuant to a directive from the Court. His report contains the remaining disclosures required by Rule 26.

Plaintiffs hereby cross designate and state that they may call any expert witness identified or designated by any party or any employee or representative of any party, subject to any objections that Plaintiffs may make concerning the designation or qualifications of those witnesses. Plaintiffs reserve the right to elicit by way of cross examination, opinion testimony from experts or corporate representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit. Plaintiffs reserve the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render testimony, but are not retained or designated experts at this time and who have expertise in certain areas regarding the facts of this case. Such witnesses include employees

and/or officers of *LA UNION DEL PUEBLO ENTERO, INC.* (LUPE). Plaintiffs reserve the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit. Plaintiffs reserve the right to call any expert witness of any party who may be added to this lawsuit.

Dated: June 27, 2014

Respectfully submitted,

/s/ Robert W. Doggett

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MARGARITO MARTINEZ LARA,  
MAXIMINA MARTINEZ LARA,  
and *LA UNION DEL PUEBLO ENTERO, INC.*)

### **CERTIFICATE OF SERVICE**

I hereby certify that on the date of filing, I served all counsel of record by email with a copy of this designation and provided a link where a copy of the report may be downloaded.

/s/ Robert W. Doggett  
Robert W. Doggett